

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

UNITED STATES OF AMERICA

v.

AMADEO FERNANDEZ

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3:21-CR-00015-29

**MOTION FOR DETENTION HEARING TO SEEK BOND REDETERMINATION
(Filed Under Seal)**

TO THE HONORABLE JUDGE HANEN:

COMES NOW AMADEO FERNANDEZ, Defendant in the above styled and numbered cause, and moves this honorable Court to hold a new hearing to redetermine his bond, and in support of this motion he would show the Court as follows:

I.

Defendant is one of approximately 30 people charged in the case at hand. This defendant is charged only in County 30 of the 30-count indictment. Most of his co-defendants are out of bond. This case was designated as a complex case because of the amount of discovery involved, as well as the many parties involved in the case. Defendant has been detained without a bond, and his children are suffering extreme hardship in his absence.

This defendant has a home in Brazoria County, Texas where he lived with two of his children, including a 16-year-old United States Citizen. He had a legitimate job at D&H Mansory and cut lawns on weekends for extra income to support his family. He is not a flight risk. Although Defendant has a prior conviction from 1997 out of Mississippi for possession of marihuana, he has no other criminal history, and does not pose a threat to the community. Defendant rented a room in his house to a co-defendant, Bartolo Rodales Morales, and during the original detention hearing, evidence was introduced that the Defendant and/or his children had easy access to the area that was rented. However, counsel has additional evidence to show the Court the contrary.

Given this new evidence, and the time that it will take for this case to go to trial given its designation as a complex case, Defendant herein requests a new detention hearing, and a redetermination by the Court of the denial of his bond.

WHEREFORE, the Defendant prays that this Court conduct a new detention hearing in this case and reconsider the bond.

Respectfully Submitted,

/s/ Yalila Guerrero

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CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2022, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Yalila Guerrero

Yalila Guerrero